

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Housing and Communities		
Service Area:	Housing Delivery		
Name of the proposal:	Delivering More Affordable Housing in York – Castle Mills and update on the Housing Delivery Programme		
Lead officer:	Florence Liber		
Date assessment completed:	16 January 2026		
Names of those who contributed to the assessment:			
Name	Job title	Organisation	Area of expertise

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p>The report seeks to continue the development of a strong new build pipeline with a budget to prepare the design by adapting existing proposals to build 100% affordable housing at the Castle Mills site; submit a planning application; apply for Homes England’s Social and Affordable Homes Programme (SAHP) grant; and procure a development partner, with an updated business case to be presented to and approval sought from the Executive before entering into a construction contract.</p> <p>The reports also notes that Brownfield Fund grants have been awarded from the York and North Yorkshire Mayoral Combined Authority (YNYMCA) to CYC for the development of affordable housing at Castle Mills, Former Manor School and 68 Centre sites and seeks approval to enter into respective grant agreements to receive funding. Finally, it is also proposed that a bid to Homes England’s Social and Affordable Homes Programme (SAHP) is submitted for Willow House once planning permission has been obtained.</p>
1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	<p>YNYMCA’s Brownfield Fund grants requires projects to be delivered within an agreed programme and require a ‘Housing Construction Start’ by March 2029 for this funding round (Round 3).</p> <p>The Homes England’s SAHP sets eligibility criteria for the affordable homes funded utilising the grant funding.</p>

1.3	Who are the stakeholders and what are their interests?
	<ul style="list-style-type: none">- City of York Council – key stakeholders within the Council include Housing Services, Building Services, Communities team, Climate reduction team- Ward Councillors- Residents and local business within existing neighbourhoods surrounding Castle Mills.

<p>1.4</p>	<p>What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2023-2027) and other corporate strategies and plans.</p>
	<p>The recommendations set out in the paper reflect the 4 Core Commitments of the Council Plan 2023-2027</p> <p>1) Equalities and Human Rights The paper proposes the development and delivery of affordable housing across the City which benefits those from lower socioeconomic backgrounds ensuring good quality housing provision. The new build homes will be built to a minimum standard of Part M4(2) ‘Accessible and Adaptable dwelling’ ensuring that the homes provide a good level of accessibility for residents throughout their lives.</p> <p>2) Affordability The affordability of housing is a key issue for residents of York evidenced by the fact that the average house price is in excess of 10 times the average salary in the city. Increasing the supply of affordable housing for a broad range of residents including those on the housing waiting list, key workers, and adults with learning disabilities and/or autism.</p> <p>3) Climate The Castle Mills development will respond as far as possible to the HDP’s Building Better Places principles including adopting a fabric first approach, while remaining viable. However, due to the existing design and viability constraints, it will not be possible to achieve Passivhaus at Castle Mills like on other recent HDP new build schemes and as set out in the Building Better Place Design Manual.</p> <p>4) Health and Wellbeing Good quality affordable housing has a positive benefit to the health and wellbeing of the residents. This paper aims to deliver high levels of affordable housing and improve access to good quality housing for the city’s residents</p>

Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
Source of data/supporting evidence	Reason for using	
Engagement with RPs for Castle Mills	Soft market testing has been undertaken which fed into an options appraisal; the outcome of the appraisal is summarised in the report.	

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
Gaps in data or knowledge	Action to deal with this	
<p>The report brings forward an outline business case for Castle Mills but a full business case will be brought to the Executive once the building contract has been tendered. The business case will need to manage the financial challenges of providing 100% affordable housing whilst ensuring the homes are affordable to the residents and meet the objectives of the Council Plan.</p>	<p>Detailed financial modelling to be undertaken once tenders are received. The Housing Delivery team will need to work closely with wider internal and external stakeholders to ensure the proposed housing meets key affordability criteria, reflecting the needs of residents across the city.</p>	
<p>Future engagement with key stakeholders and residents for Castle Mills</p>	<p>There is a planning permission already for the site which would have involved consultation with key stakeholders and neighbouring business and residents. They will be involved again in the design development of the new scheme, with the opportunity to provide ideas and influence the design through engagement events before the HDP team submit a planning application.</p>	
<p>Engagement with Housing Strategy, Lettings, Housing Management staff, and Access Officer within CYC</p>	<p>Understanding the housing demand within the city is critical to designing homes needed by our residents. The Local Housing Needs Assessment demonstrates the greatest need for affordable housing is for smaller properties which is considered during each projects design phase. To refine the tenure mix and size mix, there will be more engagement with the Housing Strategy colleagues, Lettings and Housing Management staff within CYC.</p>	

Step 4 – Analysing the impacts or effects.

4.1	<p>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.</p>		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Castle Mills a city centre high density site and will provide accessible one and two-bedroom apartments (to M4(2) accessibility standard - accessible and adaptable) accessible by stairs or lifts, for residents at all stages of life.	Positive	High
Disability	Castle Mills a city centre high density site and will provide one and two-bedroom apartments accessible by stairs or lifts. They will be designed to a minimum of M4(2) accessibility standard – accessible and adaptable) so that they can be adapted for wheelchair users.	Positive	Medium
Gender	The proposals do not relate directly to gender. There are no known implications related to gender.	Neutral	Low
Gender Reassignment	The proposals do not relate directly to those undergoing gender reassignment. There are no known implications related to gender reassignment.	Neutral	Low

Marriage and civil partnership	The proposals do not relate directly to marriage and civil partnership. There are no known implications related to marriage and civil partnership.	Neutral	Low
Pregnancy and maternity	The proposals do not relate directly to pregnancy and maternity. There are no known implications related to pregnancy and marriage.	Neutral	Low
Race	The proposals would support the housing position of Protected Characteristics Groups and provide accommodation for households with a very high level of need. The risk of community perceptions around this aspect of the Local Authority Housing Fund proposals will be managed with the support of the council's Minority Communities Officer, and the Communications team, and in particular emphasising that the plans are to increase overall affordable housing capacity which will benefit local residents as a whole within the City.	Positive	Low
Religion and belief	The proposals do not relate directly to religion and belief. There are no known implications related to religion and belief.	Neutral	Low
Sexual orientation	The proposals do not relate directly to sexual orientation. There are no known implications related to pregnancy and marriage.	Neutral	Low
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	The proposals do not relate directly to carers.	Neutral	Low

Low income groups	The proposals benefit low income groups. Affordable housing is more accessible to low income groups.	Positive	High
Veterans, Armed Forces Community	There is a high prevalence of homelessness among this socio-economic group and therefore the increased provision of affordable housing will impact this group.	Positive	Low
Other			
Impact on human rights:			
List any human rights impacted.	N/A		

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a **POSITIVE** impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a **NEGATIVE** impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a **NEUTRAL** effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
No adverse impacts have been noted above through the analysis however the projects will need to be managed thoroughly to ensure the benefits are realised. Affordability is critical to the delivery of the Council Plan's objectives and therefore this will need to be monitored closely to ensure that these objectives are delivered.	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposals	The analysis demonstrates that the proposals are robust with no negative impact to individuals or communities with protected characteristics. The Housing Delivery Programme is committed to creating inclusive and welcoming communities and will work collaboratively with stakeholders throughout the design and development process to deliver against objectives and monitor and adjust to any failure to meet these outcomes.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Refine the proposed size mix of the Castle Mills proposal	Engagement with Housing Strategy and Lettings and Housing Management staff within CYC and engagement with the community to ensure the accommodation offer meets the needs of residents.	Housing Development Manager for Castle Mills	Autumn 2026

Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	Continuous discussion and communication with residents and other stakeholders to identify and issues or improvement. Post occupation surveys to be carried out of new build projects to understand the outcomes for protected characteristic and marginalised groups. Fortnightly cross-department meetings to review progress. The project will also be reviewed by Housing Delivery and Asset Management Board on a monthly basis.